

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

WINDSOR MORRISON,

Plaintiff,

- against -

AFFIDAVIT OF
SHONTELL MORRIS
14 CV 4508 (MKB)(VMS)

THE CITY OF NEW YORK, PETER MORALES and
EDMUND MORRIS, employees of the New York City
Police Department,

Defendants.

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

SHONTELL MORRIS, bring duly sworn, deposes and says:

1. I am not a party to the above action and am over the age of eighteen (18) years. I am in my thirties.
2. I am employed by Envoy Air as a Lead Passenger Service Agent and have worked at Kennedy Airport for approximately four years. I live in Brooklyn.
3. I am acquainted with Windsor Morrison, having met him in approximately November 2012 through a mutual acquaintance, Damien Lewis.
4. On May 25, 2013, Mr. Morrison gave me a lift in his automobile to take me to Mr. Lewis, who was my boyfriend at the time. I was to meet Mr. Lewis at a friend's home on Eldert Lane near Linden Boulevard in Brooklyn. Mr. Morrison is friends with Mr. Lewis and was giving me a lift as a favor to him.

5. Mr. Morrison picked me up at the Broadway Junction subway stations. I had been in his car before, and I sat in the rear seat because the front passenger door did not work and could not open. The ride was going to be about a half an hour.

6. A few blocks from where Mr. Morrison was going to drop me, a police car started following us and then signaled Mr. Morrison to pull over. He stopped the car about two blocks from where I was going.

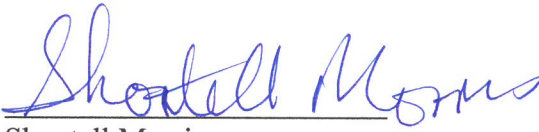
7. I have been a passenger in many cars over the years and I am able to estimate the speed in which a car is traveling. In the minutes before the police stopped Windsor's car, he was driving in a way that I would describe as totally normal and reasonable. He did not appear to be speeding.

8. Mr. Morrison's attorney has advised me that the police claim that Windsor was driving at speeds of up to fifty (50) miles per hour in the minutes before they stopped him. While I do not know the exact speed the car was traveling right before the police stopped it, I can say without any doubt in my mind that Windsor was not driving his car anywhere near 50 mph. To the contrary, there was nothing out of the ordinary about how Windsor drove the car that day. At no time did I feel that the vehicle was speeding or in any way concerned for my safety. In fact, I had no idea why the car had been stopped by the police because, before that, nothing out of the ordinary had happened and the vehicle was being driven at what I can only describe as safely and reasonably.

9. I have also been advised by Windsor's attorney that one of the police officers who stopped the vehicle claims that he spoke to me and that I told him that I did not know Windsor and that he was operating a taxi. This is not true. Neither of the two officers that stopped the car spoke to me or asked me if I knew Windsor or why I was in his car. While the police spoke to

Windsor, I basically sat silently in the back seat of the car. After several minutes, I asked the officer who was standing by the passenger side of the car whether I could leave and he said that I could. I left and walked the remaining blocks to where I was to meet my boyfriend.

Dated: March 26, 2018


Shontell Morris

Sworn to Before Me
March 26, 2018

